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*Attorneys for Defendant  
Otto Trucking LLC*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc.; Ottomotto LLC; Otto  
Trucking LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF JAMES LIN IN  
SUPPORT OF DEFENDANT OTTO  
TRUCKING'S ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
PORTIONS OF ITS MOTION TO  
COMPEL DEPOSITION OF LARRY  
PAGE**

Courtroom: F, 15th Floor  
Judge: Honorable Jacqueline S. Corley  
Trial Date: October 10, 2017

Filed/Lodged Concurrently with:  
1. Admin. Mtn. to File Documents Under Seal  
2. [Proposed] Order  
3. Redacted/Unredacted Versions  
4. Proof of Service

I, James Lin, declare as follows:

1. I am counsel at the law firm of Goodwin Procter LLP, counsel of record for Defendant Otto Trucking LLC (“Otto Trucking”). I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Defendant Otto Trucking’s Administrative Motion to File Under Seal Portions of its Motion to Compel Deposition of Larry Page (the “Motion”).

2. I have reviewed the following documents and confirmed that only the portions identified below merit provisional sealing:

Document	Portions to Be Filed Under Seal
Letter Brief re Deposition of Larry Page	Highlighted Portions
Exhibit 1 – Transcript of the deposition of Larry Page, dated July 17, 2017	Highlighted Portions
Exhibit 2 – Meet and confer email between counsel, dated July 30, 2017	Highlighted Portions
Exhibit 3 – Excerpts from the transcript of the Deposition of Zachary Morriss, dated July 26, 2017	Entire Document
Exhibit 4 – Excerpts from the transcript of the deposition of Bryan Salesky, dated July 24, 2017	Entire Document
Exhibit 5 – Email between Sebastian Thrun and Larry Page, dated April 11, 2015, Bates WAYMO-UBER-00026174	Entire Document

3. Otto Trucking seeks to seal the documents and portions of documents referenced above because they contain information that Waymo has designated as either Highly Confidential—Attorneys’ Eyes Only” or “Confidential” under the terms of the parties’ protective order. Otto Trucking takes no position as to the merits of the confidentiality designations in

1 Exhibit 2-5. However, it objects to the merits of portions of the sealing material designated by  
2 Waymo in Exhibits 1, portions of the transcript from the deposition of Larry Page, and will meet  
3 and confer with Waymo about the designations.

4 4. Otto Trucking anticipates that Waymo will file a declaration in accordance with  
5 Local Rule 79-5.

6 5. Otto Trucking's request to seal is narrowly tailored to those portions of the  
7 motion's supporting documents that merit sealing.

8 I declare under penalty of perjury under the laws of the United States that the foregoing is  
9 true and correct. Executed this 2nd day of August, 2017 in Menlo Park, California.

10  
11 /s/ James Lin  
JAMES LIN